#### REDACTED – PUBLIC VERSION

### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

SMITH KLINE & FRENCH LABORATORIES, LTD, AND SMITHKLINE BEECHAM CORP.. d/b/a GLAXOSMITHKLINE,

Plaintiffs,

v.

TEVA PHARMACEUTICALS USA, INC.,

Defendant.

Civil Action No. 05-197 GMS

FILED UNDER SEAL

#### DEFENDANT TEVA PHARMACEUTICALS USA, INC.'S DEPOSITION DESIGNATIONS AND OBJECTIONS, **COUNTERDESIGNATIONS AND COMPLETENESS DESIGNATIONS**

The following sets forth defendant Teva Pharmaceuticals USA, Inc.'s ("Teva's") affirmative deposition testimony designations and objections, counterdesignations, and completeness designations to plaintiffs' Smith Kline & French Laboratories, Ltd. and SmithKline Beecham Corp., d/b/a GlaxoSmithKline (collectively "GSK's") deposition testimony designations.

Respectfully submitted,

John W. Shaw (No. 3362)

Monté T. Squire (No. 4764)

YOUNG CONAWAY STARGATT &

TAYLOR, LLP

The Brandywine Building 1000 West Street, 17th Floor

Wilmington, DE 19801

Telephone: (302) 571-6600

msquire@ycst.com

Attorneys for Defendant Teva Pharmaceuticals USA, Inc. Of Counsel
Daniel F. Attridge, P.C.
Edward C. Donovan
Andrew B. Kay
Charanjit Brahma
Corey J. Manley
Valerie L. Gutmann
KIRKLAND & ELLIS LLP
655 Fifteenth St., N.W.
Suite 1200
Washington, D.C. 20005
Telephone: (202) 879-5000

Dated: February 7, 2007

# **Deposition Testimony of Harry Boghigian**

START PAGE	START LINE	ENDING PAGE	ENDING LINE
1	1	336	22

START PAGE	START LINE	ENDING PAGE	ENDING LINE
5	15	6	2
7	1	7	7
9	4	9	13
10	22	11	3
22	15	23	1
31	21	32	12
32	15	33	6
75	4	75	7
77	1	77	9
102	12	103	2
123	10	123	17
124	15	124	20
128	1	128	18
132	2	132	17
141	1	141	5
141	8	141	9
150	6	150	16
152	22	153	4
159.	14	162	7
162	9	162	18
162	21	163	12
163	14	163	17
164	12	164	21
165	1	165	17
194	4	195	4
203	8	203	15
207	5	207	11
208	9	208	19
212	13	215	6
221	22	222	16
224	10	225	6
258	22	259	4
259	6	259	8
259	10	259	12
272	10	272	11
272	14	273	8
274	12	274	14
274	19	274	19
274	21	276	10
287	15	288	5
290	7	290	13
291	10	291	14
291	16	291	21
300	14	300	22

	TEVA'S OBJECTIONS			
START PAGE	START LINE	ENDING PAGE	ENDING LINE	
22	15	24	13	
32	5	32	10	
32	11	32	19	Hearsay, No Foundation
54	20	57	9	Hearsay
57	10	58	3	Hearsay
59	2	59	5	Hearsay
60	7	60	16	Hearsay
60	17	61	2	Hearsay
62	21	65	4	Hearsay
65	5	67	8	Hearsay
69	8	69	21	Hearsay
				Hearsay, No
73	11	75	3	Foundation
75	8	76	22	
77	10	79	2	
80	2	80	10	
80	11	80	19	Hearsay, No Foundation
81	5	81	20	
81	21	83	3	Hearsay
83	4	83	9	Hearsay
83	10	84	1	Hearsay, No Foundation
84	13	85	1	Hearsay
87	1	87	16	Hearsay
87	17	89	10	Hearsay, No Foundation
89	11	90	9	Hearsay, No Foundation
96	10	97	1	Hearsay, No Foundation
103	3	103	12	
125	12	127	15	Hearsay, No Foundation
176	17	177	8	Hearsay, Relevano
203	16	204	12	Relevance, No Foundation
230	13	231	5	Hearsay

#### Teva's Counterdesignations to GSK's Affirmative Designations

START PAGE	START LINE	ENDING PAGE	ENDING LINE
19	14	20	6
20	19	21	10
46	18	47	5
48	13	48	19
103	13	103	18
113	13	114	1
124	15	124	20
152	22	153	4
156	17	156	22
212	13	215	6
263	1	263	8
264	20	265	6
265	11	265	19

# Teva's Objections and Completeness Designations to GSK's Counterdesignations

GSK's	GSK'S COUNTERDESIGNATIONS		GSK'S COUNTERDESIGNATIONS  TEVA'S OBJECTIONS				TEVA'S COMPLETENESS DESIGNATIONS			
START PAGE	START LINE	ENDING PAGE	ENDING LINE	OBJECTIONS	START PAGE	START LINE	ENDING PAGE	ENDING LINE		
76	6	76	7	Relevance, Outside Scope, Incomplete	76	4	76	5		
282	2	282	8	Incomplete, Relevance	281	4	282	1		
283	10	283	12	Relevance, Outside Scope, Incomplete						
312	18	314	4	Outside Scope, Incomplete	317	11	318	3		
319	6	320	2	Outside Scope, Incomplete	321	2	321	6		

# **Deposition Testimony of Roger Eden**

START PAGE	START LINE	ENDING PAGE	ENDING LINE
6	16	6	19
9	5	9	14
27	14	28	1
40	8	40	19
40	20	41	10
41	16	42	19
59	6	60	1
60	18	62	8
63	1	63	7
63	8	63	18
63	19	64	11
64	16	65	9
66	2	66	10
72	4	72	19
74	12	75	1
80	7	80	10
80	12	80	12
80	13	80	19
88	1	88	6
88	8	88	12
89	16	90	11
92	19	93	10
94	14	94	20
98	18	98	21
100	2 .	100	16
107	20	108	2
108	4	108	9
110	22	112	2
148	2	148	3
148	9	148	22
154	1	154	5
154	11	154	15
154	18	155	2
163	1	163	4
164	6	164	8
164	12	164	14
165	4	165	9
165	12	165	13
166	8	166	14
183	15	184	6
208	5	208	13
209	1	209	3
209	6	209	6
218	3	218	14
218	17	219	2

START PAGE	START LINE	ENDING PAGE	ENDING LINE
220	15	221	14
221	16	221	19
221	21	221	21
229	11	229	13
229	17	229	19
242	3	243	6
243	8	243	8
246	22	247	3
247	16	247	20
247	22	248	1
248	16	248	17
249	16	250	20
251	9	251	19
251	22	252	11
252	13	252	15
252	17	252	18
253	1	253	16
253	19	254	1
254	3	254	13
254	16	255	5

# **Deposition Testimony of Roger Eden**

	TEVA'S OBJECTIONS			
START PAGE	START LINE	ENDING PAGE	ENDING LINE	
16	15	16	20	
27	14	28	15	
33	6	34	1	Relevance
37	13	39	3	Relevance
39	19	40	19	
42	7	42	22	
59	6	60	12	
63	1	63	18	Hearsay
64	8	67	20	Hearsay
70	20	72	19	Hearsay
80	. 15	81	2	Hearsay
81	15	81	18	Hearsay
108	10	108	18	No Foundation
109	10	110	14	
110	15	110	21	Relevance
162	20	165	3	
181	19	182	19	
183	21	184	6	
184	15	185	5	
186	13	186	15	Relevance
237	4	237	18	Relevance

## **Deposition Testimony of Roger Eden**

### Teva's Counterdesignations to GSK's Affirmative Designations

START PAGE	START LINE	ENDING PAGE	ENDING LINE
44	4	44	13
47	10	48	2
74	20	75	1
91	18	91	22
94	21	95	5
103	3	103	8
122	17	123	8
123	11	123	11
127	18	127	21
128	2	128	2
133	13	133	16
134	18	136	11
149	13	153	17
158	15	158	22
182	20	183	9
186	16	187	4
248	2	248	10
258	11	258	15

START PAGE	START LINE	ENDING PAGE	ENDING LINE
5	16	5	21
10	2	10	10
10	15	11	8
12	17	14	19
17	6	17	21
44	12	44	19
182	1	183	3
216	15	218	3
221	3	222	13
222	15	222	17
222	19	223	10
223	12	223	15
223	17	223	17
227	9	228	3
228	5	228	5
228	7	228	11
228	13	228	13
228	15	229	6
229	8	229	8
230	5	231	20
236	13	237	12
237	15	237	19
248	12	248	15
248	22	249	12
249	18	252	18

	GSK'S AFFIRMATIVE DESIGNATIONS				
START PAGE	START LINE	ENDING PAGE	ENDING LINE		
14	6	16	1		
17	22	18	19		
27	5	27	10		
31	19	32	3		
37	10	41	18		
44	12	44	19		
67	20	68	15		
69	11	71	11		
79	16	80	20		
82	15	82	18		
94	5	94	17		
100	4	100	16		
102	18	103	4		
104	2	104	18		
109	17	110	11		
111	18	112	1		
114	5	114	7		
115	3	115	16		
118	9	119	2		
126	1	126	10		
127	5	127	17		
141	10	141	13		
146	22	147	3		
147	18	149	17		
159	17	160	6		
167	11	167	14	Relevance	
167	15	168	16		
169	15	170	5		
182	21	183	3		
201	9	201	21		
223	19	225	20		
253	12	254	5		
275	15	276	6		

#### Teva's Counterdesignations to GSK's Affirmative Designations

START PAGE	START LINE	ENDING PAGE	ENDING LINE
27	11	28	7
101	3	101	5
101	7	101	8
103	6	103	14
105	16	106	17
112	2	112	11
116	6	116	19
121	15	122	5
154	15	156	9
178	21	180	20
238	11	239	4
239	22	240	7
256	8	256	9
256	11	256	12
276	7	276	12
276	14	277	1
277	3	277	5
277	7	277	18

# Teva's Objections and Completeness Designations to GSK's Counterdesignations

GSK'S COUNTERDESIGNATIONS			DESIGNATIONS  TEVA'S  OBJECTIONS		TEVA'S COMPLETENESS DESIGNATIONS			
START PAGE	START LINE	ENDING PAGE	ENDING LINE	OBSESTIONS	START PAGE			ENDING LINE
31	19	32	3	Outside Scope, Relevance				
115	3	115	7	Outside Scope, Relevance				
115	8	115	16					
116	6	116	15	Outside Scope, Relevance				
120	14	121	4					
223	19	225	20	Outside Scope, Relevance				

START PAGE	START LINE	ENDING PAGE	ENDING LINE
9	5	9	11
17	6	17	16
54	4	55	7
55	9	56	1
56	5	57	14
57	16	59	4
59	10	60	13
132	8	135	17
135	20	136	22
137	3	138	7
138	9	138	. 16
138	19	138	19
138	21	139	8
139	11	140	16
140	19	141	21
142	1	142	4
142	8	142	14
142	16	143	3
143	5	143	6
144	11	145	6
145	8	145	14
145	16	146	12
146	14	149	14
149	17	149	17
149	20	149	21
202	10	208	3

	TEVA'S OBJECTION			
START PAGE	START LINE	ENDING PAGE	ENDING LINE	
9	5	10	6	
12	2	12	13	
17	6	17	16	
29	9	32	9	
33	1	33	22	
34	1	34	18	
35	15	35	20	
35	21	36	14	
37	13	38	7	
39	5	42	3	
45	10	45	19	
47	1	47	14	No Foundation
60	22	61	8	Relevance
61	9	62	1	
71	14	72	3	
82	12	82	21	Relevance
88	10	88	15	
99	21	100	12	
100	13	100	16	Relevance
101	11	102	3	
102	4	102	12	Relevance
103	8	104	19	
117	12	118	7	
120	1	120	18	
123	15	124	3	
143	20	144	10	
162	2	162	14	
197	4	197	11	

### Teva's Counterdesignations to GSK's Affirmative Designations

START PAGE	START LINE	ENDING PAGE	ENDING LINE
62	7	62	12
124	4	125	2
128	12	129	3
130	6	130	15
180	7	181	9
212	6	213	19

# Teva's Objections and Completeness Designations to GSK's Counterdesignations

GSK'	S COUNTE	RDESIGNA	TIONS	TEVA'S OBJECTIONS	TEVA'S COMPLETENESS DESIGNATIONS			SS
START PAGE	START LINE	ENDING PAGE	ENDING LINE	OBOLOTIONS	START START ENDING PAGE LINE PAGE			ENDING LINE
29	9	30	11		27	17	29	8
47	1	47	14		47	15	48	14
143	7	144	10		144	11	146	15

START PAGE	START LINE	ENDING PAGE	ENDING LINE
8	20	9	3
9	18	9	20
16	12	17	6
21	3	21	6
42	2	42	11
48	4	48	6
48	13	48	15
48	21	49	22
81	5	81	22
141	10	142	11
144	12	145	3
146	2	146	20
147	20	148	8
149	11	149	16
150	16	151	17
152	2	152	7
169	10	169	16
177	10	177	17
185	1	185	6
185	18	185	21
187	18	187	22
188	3	189	11
194	2	194	12
194	20	195	19
196	10	196	16
202	4	202	16
208	12	208	18
212	5	212	21
213	9	213	13
241	6	241	22
250	2	251	11
261	7	261	9
261	16	262	1
263	12	264	7

	TEVA'S OBJECTIONS			
START PAGE	START LINE	ENDING PAGE	<b>ENDING LINE</b>	
9	. 14	10	10	
16	2	16	8	
16	12	16	16	
21	11	25	16	
29	3	29	12	
31	6	33	7	
34	6	35	19	
42	2	43	10	
45	5	46	8	
49	7	51	1	
51	21	54	22	
55	9	55	15	
60	13	65	4	
69	22	72	5	
74	15	76	13	Foundation
79	3	80	9	
85	12	86	13	
87	10	89	14	
119	4	119	11	
122	13	122	18	
123	16	127	22	
130	15	131	7	
140	21	141	5	
195	9	196	16	
221	6	222	3	
238	16	239	9	
242	4	243	9	
277	21	280	14	
281	7	281	14	
282	3	282	6	

### Teva's Counterdesignations to GSK's Affirmative Designations

START PAGE	START LINE	ENDING PAGE	ENDING LINE
55	16	56	7
142	12	142	20
145	4	145	14
183	1	183	18
184	2	185	6

# Teva's Objections and Completeness Designations to GSK's Counterdesignations

GSK'	S COUNTE	ERDESIGNA	ATIONS	TEVA'S OBJECTIONS	Т	TEVA'S COMPLETENESS DESIGNATIONS		
START PAGE	START LINE	ENDING PAGE	ENDING LINE	obozoniono	START PAGE			ENDING LINE
36	17	36	22					
37	1	37	3					
37	15	38	6					
176	2	177	9	Outside Scope				

START PAGE	START LINE	ENDING PAGE	ENDING LINE
5	15	5	20
6	6	6	9
8	7	8	20
92	17	92	19
92	21	92	21
107	11	108	1
108	5	108	8
108	13	108	16
110	6	110	17
110	19	110	19
115	2	116	2
116	4	116	8
116	10	118	8
118	10	118	11
118	13	118	13
118	15	118	15
118	17	120	5
120	7	120	10
120	12	120	14
120	16	120	17
120	19	120	19
123	2	123	14
123	16	123	19
126	19	126	20
126	22	128	6
135	3	135	17
135	19	135	20
135	22	136	7
136	9	136	10
136	12	136	13
136	15	137	2
137	4	137	7
137	9	137	13
137	15	137	17
137	19	137	19
137	21	137	21
138	1	138	4
138	6	138	11
138	13	138	13
138	15	138	17
140	22	141	8
141	10	141	10
141	12	141	13
141	15	141	15
141	17	141	17

START PAGE	START LINE	ENDING PAGE	ENDING LINE
141	19	141	22
142	2	142	2
142	4	142	4
142	6	142	6
142	8	142	8
142	10	142	17
142	19	142	22
143	2	143	3
143	5	143	5
144	18	145	3
145	5	145	6
145	8	145	10
145	12	145	13
145	15	146	6
146	8	146	11
146	13	146	17
146	19	146	20
146	22	147	2
147	5	147	6
147	8	147	9
147	11	147	11
147	13	147	13
152	11	153	10
154	13	154	14
154	21	155	9
155	11	155	12
155	14	155	16
155	18	155	22
156	2	156	6
156	8		
156		156	8
157	10 2	156	22
157		157	3
	5	157	19
157	21	157	21
158	1	158	22
159	2	159	3
160	12	160	17
160	19	160	20
160	22	161	1
161	3	161	8
161	10	161	15
161	17	161	19
161	21	162	1
162	3	162	4
162	6	162	7
162	9	162	9
163	17	163	19
163	21	163	22
166	18	167	8
167	10	167	15
168	9	168	12
168	14	168	15

START PAGE	START LINE	ENDING PAGE	ENDING LINE
168	17	168	22
176	12	176	17
176	19	176	20
177	20	177	22
178	2	178	2
178	4	178	12
190	4	190	16
190	18	190	19
190	21	191	3
191	5	191	5
200	5	200	12
200	14	200	14
200	16	201	5
201	7	201	7
201	9	201	10
201	12	201	12
201	14	201	18
201	20	201	21
214	6	214	13
214	15	214	15
225	1	225	3
225	7	226	16

	TEVA'S OBJECTIONS			
START PAGE	START LINE	ENDING PAGE	<b>ENDING LINE</b>	
6	6	6	9	
8	7	8	20	
9	21	10	18	
17	7	17	18	
20	5	20	9	
20	17	21	6	
42	19	43	2	
44	1	44	21	Hearsay, No Foundation
55	5	55	17	
56	10	56	16	
59	5	59	19	
60	16	61	5	
67	11	67	16	
84	12	85	6	
92	8	92	21	
95	7	96	3	Relevance
105	21	106	3	
106	4	107	5	Hearsay
169	1	169	17	
248	1	248	7	Relevance

### Teva's Counterdesignations to GSK's Affirmative Designations

START PAGE	START LINE	ENDING PAGE	ENDING LINE
10	19	11	8
14	12	15	10
55	1	55	4
62	22	63	11
84	4	84	5
128	7	128	19
129	2	129	2
129	4	129	20
130	5	130	6
130	8	130	10
170	19	170	22
171	2	171	3
205	21	206	14
212	12	212	14
212	16	212	19

# Teva's Objections and Completeness Designations to GSK's Counterdesignations

GSK's	GSK'S COUNTERDESIGNATIO	ATIONS	TEVA'S OBJECTIONS	TEVA'S COMPLETENESS DESIGNATIONS				
START PAGE	START LINE	ENDING PAGE	ENDING LINE		START PAGE	START LINE	ENDING PAGE	ENDING LINE
10	16	10	18	Outside Scope				
18	8	18	12					
21	5	21	6					
21	21	22	9					
23	2	23	5					
29	1	29	8	Outside Scope				
43	17	43	19					
44	6	44	20					
45	9	45	15					
57	2	57	4	Outside Scope				
74	5	74	19				-	
74	17	74	19					
84	17	85	6					
120	12	120	14					
126	22	127	4					
133	5	133	10					
169	1	169	5					
203 204	4 18	203 204	21 21	Outside Scope, No Foundation, Incomplete	203	22	204	6
206	21	207	5	Outside Scope, No Foundation				

# **Deposition Testimony of William Huffman**

### **Teva's Affirmative Designations**

START PAGE	START LINE	ENDING PAGE	ENDING LINE
174	17	174	21

...

## **Deposition Testimony of William Huffman**

	TEVA'S OBJECTIONS			
START PAGE	START LINE	ENDING PAGE	<b>ENDING LINE</b>	
21	3	23	7	Hearsay
				Relevance,
24	4	24	13	Hearsay
24	21	25	5	
26	9	26	22	
27	11	27	14	Relevance
32	12	32	21	
33	15	34	2	
64	4	64	11	Relevance
64	20	65	8	Relevance
65	17	66	7	Relevance
66	16	68	13	
69	10	71	21	Relevance
72	4	72	12	Relevance
73	20	74	4	Relevance
80	16	81	1	Relevance
86	22	88	18	Relevance
92	7	93	2	Relevance
95	5	95	8	Relevance
98	22	100	6	
101	17	103	4	
113	3	113	10	Relevance
117	8	117	13	Relevance
119	7	120	8	Relevance
128	9	128	16	Relevance
129	1	129	4	
				Relevance,
148	18	149	14	Hearsay
174	17	175	16	
177	16	177	20	Relevance

# **Deposition Testimony of William Huffman**

### Teva's Counterdesignations to GSK's Affirmative Designations

START PAGE	START LINE	ENDING PAGE	ENDING LINE
80	11	80	15

# **Deposition Testimony of Deborah Jaskot**

	TEVA'S OBJECTIONS			
START PAGE	START LINE	ENDING PAGE	ENDING LINE	
4	21	4	22	
14	8	14	21	
16	25	17	9	
29	20	30	3	Relevance
30	20	31	22	Relevance
33	2	33	16	Relevance, Vague, Overbroad
36	14	37	25	Relevance, Vague, Calls for Legal Conclusion
69	17	70	18	Relevance
83	13	84	23	Relevance, Foundation
86	21	87	15	Relevance
124	17	124	19	Relevance
157	13	157	24	Relevance, Foundation

Case 1:05-cv-00197-GMS

#### Teva's Counterdesignations to GSK's Affirmative Designations

START PAGE	START LINE	ENDING PAGE	ENDING LINE
17	10	17	16
83	9	83	12

# **Deposition Testimony of David Owen**

START PAGE	START LINE	ENDING PAGE	ENDING LINE	
5	13	5	14	
6	8	6	18	
7	1	7	5	
7	14	8	12	
17	10	18	4	
20	12	20	17	
20	21	20	22	
25	21	26	5	
26	19	29	8	
29	10	29	11	
30	5	30	21	
31	14	32	10	
33	4	33	10	
34	14	35	9	
40	6	40	21	
41	1	41	3	
42	19	43	2	
50	3	51	8	
54	7	55	8	
65	2	65	6	
70	15	72	6	
72	8	74	4	
74	6	74	19	
75	3	75	17	
81	10	85	5	
85	19	85	22	
88	14	89	15	
90	16	91	18	
93	3	93	21	
99	5	99	10	
99	12	100	9	
101	8	104	4	
104	12	108	17	
108	19	109	2	
110	10	111	3	
114	21	115	15	
117	7	118	19	
119	19	121	7	
121	13	121	16	
124	7	125	5	
125	9	125	20	
125	22	126	2	
126	9	127	13	
127	16	127	17	
129	16	130	2	

START PAGE	START LINE	ENDING PAGE	ENDING LINE
130	4	130	16
130	18	132	3
132	5	132	21
133	1	133	10
133	13	133	14
134	1	140	7
141	1	141	13
152	6	153	7
156	14	157	2
157	3	157	20
161	1	161	21
163	4	164	18
166	16	168	13
168	15	170	1
170	3	170	18
170	20	171	3
174	1	174	7
181	16	181	19
182	7	184	11
184	14	185	5
185	8	185	12
185	14	185	20
185	22	186	3
186	22	188	13
188	15	188	15
189	17	190	8
190	17	191	9
191	11	191	17
191	19	192	17
192	19	193	3
202	10	203	5
204	2	204	10
204	13	204	16
204	18	205	1
205	22	206	13
206	18	207	1
207	4	207	4
209	3	209	22
210	2	210	5
211	9	211	15
211	17	211	21
216	3	216	13
216	15	217	7
217	9	217	11
217	13	217	18
217	20	221	15
229	14	230	5
230	7		
		230	18
231	9	231	22
244	20	246	3

# **Deposition Testimony of David Owen**

	TEVA'S OBJECTIONS			
START PAGE	START LINE	ENDING PAGE	ENDING LINE	
21	1	22	2	Relevance
24	2	25	3	Relevance
26	19	27	17	
31	14	31	22	
34	14	35	9	
38	1	39	4	
42	19	43	2	
43	12	45	17	
46	4	47	1	
49	3	50	2	
52	2	52	11	
54	7	60	13	Hearsay
61	11	62	13	
63	10	63	22	Hearsay
64	16	65	1	
65	2	65	12	
66	5	69	1	
70	15	71	5	
71	10	72	2	Hearsay
72	3	73	8	Hearsay
80	14	81	9	
82	19	83	8	
94	9	95	7	
96	11	97	7	No Foundation
97	21	98	17	Hearsay
98	18	99	4	
104	18	106	1	Hearsay
109	3	109	14	Hearsay
112	13	113	<u>- · ·                                   </u>	
114	21	115	15	
150	15	151	9	
161	1	161	21	
169	9	169	21	
174	20	176	11	
178	12	178	21	Hearsay
179	19	180	11	
208	4	208	21	
244	20	248	11	
250	3	251	12	Relevance

### **Deposition Testimony of David Owen**

#### Teva's Counterdesignations to GSK's Affirmative Designations

START PAGE	START LINE	ENDING PAGE	ENDING LINE
13	14	14	13
81	10	82	15
86	1	88	1
88	4	88	13
91	11	91	22
92	4	92	7
93	22	94	4
95	9	96	1
110	21	111	3
224	10	224	15
256	8	257	8

### **Deposition Testimony of David Owen**

# Teva's Objections and Completeness Designations to GSK's Counterdesignations

GSK'	S COUNTE	ERDESIGNA	ATIONS	TEVA'S OBJECTIONS	TEVA'S COMPLETENES DESIGNATIONS		SS	
START PAGE	START LINE	ENDING PAGE	ENDING LINE	obstanta	START PAGE	START LINE	ENDING PAGE	ENDING LINE
31	5	31	13					
40	13	41	3					
52	2	52	11	Incomplete				
59	8	59	22					
59	6	60	13					
60	6	60	13					
65	12	65	22					
66	1	66	4					
66	5	67	21					
72	3	72	13	Incomplete				
72	3	73	4	Incomplete				
80	14	81	9	Not Responsive				
91	19	92	7	Outside Scope				
94	19	95	7					
95	12	96	1	Outside Scope				
96	17	97	20					
104	18	106	1	Outside Scope	-			
109	3	109	14	Outside Scope				
118	15	119	18	Outside Scope				
118	20	119	18	Outside Scope				
119	10	119	18	Outside Scope				
121	17	122	11	Outside Scope	-			-
122	12	122	22	Outside Scope	-	-		
126	3	126	8	Outside Scope				
129	9	129	15					
131	5	131	7					
141	5	141	7					
142	1	142	5	Outside Scope, Incomplete				
152	6	152	18					
153	8	153	12					
159	9	159	13					
164	19	165	19					
166	9	166	15	Outside Scope				
169	9	169	21					
171	17	172	5	Outside Scope, Incomplete				
175	17	176	11	Outside Scope, Incomplete, Relevance				
177	2	177	14	Outside Scope				

			т	· · · · · · · · · · · · · · · · · · ·				
GSK'	S COUNTE	ERDESIGNA	ATIONS	TEVA'S	TEVA'S COMPLETENESS DESIGNATIONS			
START PAGE	START LINE	ENDING PAGE	ENDING LINE	OBJECTIONS	START PAGE	START LINE	ENDING PAGE	ENDING LINE
178	5	178	21	Outside Scope				
193	19	194	6					
200	16	200	19					
201	10	201	22	Outside Scope, Incomplete				
203	6	203	21		_			
206	14	206	17	Incomplete, Relevance				
208	4	208	21	Outside Scope				
210	6	211	8					
214	22	215	7					
230	11	230	18					
238	14	239	3	Outside Scope, Not Responsive				
240	5	240	15	Outside Scope				
240	11	240	15	Outside Scope				
255	1	255	4	Outside Scope				

### **Deposition Testimony of Anne Payne**

	GSK'S AFFIRMATIVE DESIGNATIONS				
START PAGE	START LINE	ENDING PAGE	ENDING LINE		
5	9	6	9	Relevance	
9	7	10	4		
23	9	27	18	Relevance	
45	7	45	23	Relevance	
48	23	51	3	Relevance	
53	4	53	21	Relevance	
54	16	56	9	Relevance	
70	21	72	17		
74	10	80	3	Relevance	
				Relevance, No	
124	4	126	20	Foundation	
140	6	141	25	Relevance	
144	18	146	22	Relevance	
147	15	149	21	Relevance	
151	4	151	24	Relevance	

### **Deposition Testimony of Anne Payne**

#### Teva's Counterdesignations to GSK's Affirmative Designations

	START PAGE	START LINE	ENDING PAGE	ENDING LINE
l	6	10	6	23

## **Deposition Testimony of Kevin Reeves**

#### **Teva's Affirmative Designations**

START PAGE	START LINE	ENDING PAGE	ENDING LINE
7	12	7	14
8	7	8	9
18	10	19	6
20	1	20	5
20	13	22	14
29	6	29	14
31	22	32	2
32	3	32	11
33	2	33	13
33	20	33	22
37	16	37	21
51	14	52	10
62	7	62	8
62	10	62	11
62	13	62	14
62	16	62	16
66	14	66	16
66	18	66	20
66	22	66	22
67	3	67	4
67	22	68	2
68	12	68	17
69	12	69	17
71	1	71	3
71	5	71	5
71	11	71	15
71	17	71	19
71	21	72	18
74	3	74	6
74	8	74	9
74	11	74	13
74	14	74	16
75	10	76	5
76	7	76	7
79	6	79	9
82	6	82	6
82	19	83	5
120	17	121	7
122	1	122	5
122	19	123	11
136	13	137	10
137	20	137	22
138	4	138	8
143	3	143	17
145	3	146	17

START PAGE	START LINE	ENDING PAGE	ENDING LINE
147	19	147	22
148	2	148	4
148	6	148	13
149	12	153	12
201	2	201	4
201	7	201	12
201	14	201	17
201	18	203	13
205	10	205	22
233	10	233	14
234	4	234	6
234	16	234	17
235	1	235	1
236	12	237	10
238	8	239	10
241	19	242	18
244	10	244	18
266	19	266	22
267	3	267	4

### **Deposition Testimony of Kevin Reeves**

	TEVA'S OBJECTIONS				
START PAGE	START LINE	ENDING PAGE	ENDING LINE	OBJECTIONS	
18	10	22	14		
38	21	41	12		
41	13	44	21	Hearsay	
44	22	45	21	Relevance	
45	22	46	9	Hearsay	
46	10	47	2	Hearsay	
47	3	47	20	Hearsay	
47	21	48	19	Hearsay	
48	20	49	6	Hearsay	
49	20	51	4		
51	14	52	10		
76	9	77	9		
79	6	79	18		
79	19	82	5	Hearsay	
82	6	82	12	Relevance	
82	13	82	18	Hearsay	
82	19	83	5	Trodrody	
84	<u></u> 1	85	5	Hearsay	
85	16	86	14	Hearsay	
86	15	88	1	Hearsay	
88	2	88	19	i icaisay	
103	7	105	16	Hearsay	
109	12	109	22	пеагзау	
110	12	111	22	Llograpy	
112	<u>'</u> 1	112	13	Hearsay	
136	13	137	10	Hearsay	
137				11	
137	11	137	16 3	Hearsay	
	17	138		11	
138	4	138	12	Hearsay	
151	17	152	7	Hearsay	
152	8	153	15	Hearsay	
191	9	191	14	1	
191	15	194	5	Hearsay	
194	6	194	16	Hearsay	
194	17	195	1		
199	8	204	9	Hearsay	
204	10	205	8	Hearsay	
205	9	205	22		
233	9	245	20	Hearsay	

## **Deposition Testimony of Kevin Reeves**

#### Teva's Counterdesignations to GSK's Affirmative Designations

START PAGE	START LINE	ENDING PAGE	ENDING LINE
41	13	42	5
49	7	49	18
53	3	59	14

### **Deposition Testimony of Scott Stofik**

	TEVA'S OBJECTIONS			
START PAGE	START LINE	ENDING PAGE	ENDING LINE	OBOLOTIONS
7	9	7	13	
9	23	11	7	Relevance
20	18	22	4	
22	13	24	15	
133	24	136	7	Relevance

### **Deposition Testimony of Scott Stofik**

#### Teva's Counterdesignations to GSK's Affirmative Designations

START PAGE	START LINE	ENDING PAGE	ENDING LINE
195	24	197	12

#### CERTIFICATE OF SERVICE

I, Monté T. Squire, Esquire, hereby certify that on February 14, 2007, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

> Patricia Smink Rogowski, Esquire Connolly, Bove, Lodge & Hutz LLP The Nemours Building 1007 North Orange Street Wilmington, DE 19801

I further certify that on February 14, 2007, I caused a copy of the foregoing document to be served by hand delivery on the above-listed counsel of record and the following non-registered participants in the manner indicated:

#### **BY E-MAIL**

William F. Lee, Esquire Wilmer, Cutler, Pickering, Hale and Dorr LLP 60 State Street Boston, MA 02109

Cristina C. Ashworth, Esquire Wilmer, Cutler, Pickering, Hale and Dorr LLP 1875 Pennsylvania Avenue, N.W. Washington, DC 20006

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Monté T. Squire

Monté T. Squire (No. 4764) The Brandywine Building 1000 West Street, 17th Floor Wilmington, Delaware 19801 (302) 571-6600 msquire@ycst.com

Attorneys for Teva Pharmaceuticals U.S.A., Inc.

058956.1015 DB01:1976829.1